

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

DOCKET No.: 0209 6:20-CR-06140-002

VS.

RAEKWON GREEN
A/K/A BUNDY
A/K/A BUNDLES,

**STATEMENT WITH REGARD TO
SENTENCING FACTORS/PRESENTENCE
INVESTIGATION REPORT**

DEFENDANT.

MICHAEL P. SCHIANO, ESQ., the attorney for the above Defendant, RAEKWON GREEN, has thoroughly reviewed the PreSentence Investigation Report ("PSI") prepared by U.S. Probation Officer Jessica Rider and in accordance with Rule 32(f) and (i)(4)(I) of the Federal Rules of Criminal Procedure and Sections (6)(A)(1.2) and (6)(A)(1.3) of the United States Sentencing Guidelines, hereby gives notice that the Defendant has no objection to the Presentence Investigation Report prepared on July 3, 2024, nor does the Defendant dispute the substantial factual representations contained therein about which the Defendant has no direct knowledge.

HOWEVER, we do concur with, and are respectfully asking the Court to consider, the recommendation from the Probation officer Ms. Rider that the Court may appropriately consider Mr. Green's lack of youthful guidance and the need to avoid unwarranted sentencing disparities on behalf of Mr. Green. I have attached a letter from Tamara Davis, Education Provider - Livingston County Jail setting forth training completed by Mr. Green while he was incarcerated in Livingston County Jail and a letter from Mr. Green wherein he accepts responsibility.

WE ARE RESPECTFULLY asking the Court to consider a non-guideline sentence

based upon the Defendant's age and based upon the nature of the offenses.

DATED: July 15, 2024

Respectfully submitted,



MICHAEL P. SCHIANO
Attorney for Defendant Raekwon Green
One East Main St., Suite 315
Rochester, New York 14614
Tel: (585) 546-7150

TO: Honorable Frank P. Geraci, Jr.
U.S. District Court Judge
United States District Court
100 State Street
Rochester, New York 14614

Robert Marangola, Esq.
Assistant United States Attorney
100 State Street, Suite 500
Rochester, New York 14614

Jessica Rider
U.S. Probation Officer
100 State Street, Room 1200
Rochester, New York 14614
jessica_rider@nywp.uscourts.gov

LIVINGSTON COUNTY
SHERIFF



THOMAS J. DOUGHERTY, SHERIFF

MATTHEW D. BEAN, UNDERSHERIFF

September 8, 2022

To Whom It May Concern,

I am writing to inform you that Raekwon Green has completed the NYS DOT Flagging Certification. The training was held in August 2022 and will expire in 3 years. If you have any questions or concerns regarding this training feel free to reach me at tdavis@gvboces.org or at 585-243-7085.

Thank You,

Tamara Davis

Tamara Davis
Education Provider
Livingston County Jail

DAEKWON GREEN

DEAR Judge

GREETINGS, I HOPE ALL IS
WELL TO YOU. I HOPE THAT YOU
RECEIVE THIS LETTER IN A TIMELY
MANNER. BEFORE THIS HONORABLE COURT
I'M ADDRESSING THE MATTERS OF MY
POOR DECISION MAKING.

I WOULD FIRST LIKE
TO APOLOGIZE FOR MY ACTIONS AND
MY YOUNG MENTALITY. I KNOW I
HAVE MADE ALOT OF POOR DECISION
IN MY LIFE AND I COULD ADMITT I
WAS EASILY INFLUENCED. I MAKE
NO EXCUSE FOR MY NEGATIVE BEHAVIORS.
I'VE BEEN DOING ALOT OF SELF-REFLECTING
DURING THIS INCARCERATION. I HAVE
GROWN AND LEARNED MORE ABOUT
MYSELF EACH DAY. I REALIZE THERE
IS MORE TO LIFE THEN JUST THE
STREETS OF ROCHESTER. NOT ONLY AM
I SUFFERING BUT ALSO MY FAMILY. I
HAVE A BEAUTIFUL YOUNG DAUGHTER
THAT I PRAY, I MAKE IT HOME

TO IN A TIMELY MANNER.
 LIVED THERE FOR I HAVE
 SAT DOWN AND MANAGE THAT
 PATIENTS IS Longevity. Longevity is
 THE KEY TO SUCCESS. NO MONEY IN
 THE WORLD IS WORTH MY FREEDOM
 AND THE TIME AWAY FROM MY FAMILY.
 I'm READY TO BE A MAN, AND A PRODUCTIVE
 MEMBER TO OUR SOCIETY, ALSO A BETTER
 Role model and CARE PROVIDER.

HEREIN I'VE BEEN DIAGNOSED
 AT A YOUNG AGE IN PRISON WITH
 HYPERTENSION AND HYPERTHYROID. I
 WOULD HATE TO LOOSE MY LIFE TO
 A JAIL CELL FOR BEING UNHEALTHY DUE
 TO MY POOR DECISION MAKING. THIS
 HAS BEEN ALOT FOR ME AND MADE A
 BIG IMPACT ON MY LIFE. I NO LONGER
 WANT THIS LIFE STYLE ANYMORE. I PRAY
 EVERY NIGHT FOR ANOTHER OPPORTUNITY &
 FORGIVENESS FOR MY ACTIONS. ON ANOTHER
 NOTE I WOULD LOVE TO APOLOGIZE TO
 THE VICTIMS FOR THE HORRIBLE EXPERIENCE,
 THE COURTS AND MY FAMILY FOR MY
 BEHAVIORS.

IN CONCLUSION
 I WOULD GREATLY APPRECIATE IT.

III

IF YOU CAN FORGIVE MY BEHAVIOUR AND
GIVE ME ANOTHER CHANCE TO CORRECT
MY WRONGS AND MAKE IT BACK HOME.
MOST DEFINITELY TO MY BEAUTIFUL DAUGHTER
BEFORE ITS TOO LATE. I CAN DEFINITELY
PROMISE YOU THAT I WILL BE A BETTER
MEMBER TO OUR COMMUNITY AND
PRODUCTIVE PROVIDER. I WILL ENSURE
YOU THAT YOU WON'T REGRET IT
BECAUSE YOU COULD HAVE MADE
A POSITIVE CHANGE ON THIS DEFENDANT.
I ALSO PLAN ON INTENDING RE-ENTRY
UPON RELEASE, SO YOU CAN SEE THE
CHANGE YOURSELF

I THANK YOU FOR
ALL YOUR TIME AND CONSIDERATION
IN THIS MATTER. I APPRECIATE THE
HELP IF YOU CAN. GOD BLESS

Sincerely
Rackwan Green
R-

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VS.

RAEKWON GREEN
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AFFIDAVIT OF SERVICE ELECTRONICALLY AND BY MAIL

The undersigned hereby certifies that she is an employee in the Schiano Law Office, P.C. and is a person of such age and discretion as to be competent to serve papers.

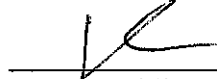
That on July 15, 2024, she served a copy of the attached:

**STATEMENT WITH REGARD TO SENTENCING
FACTORS/PRESENTENCE INVESTIGATION REPORT**

by electronic mail to U.S. District Court Judge Frank P. Geraci, Jr., Robert Marangola, Esq., AUSA and Jessica Rider, U.S. Probation Officer.


SALLY J. SKINNER

Sworn to before me this 15th
day of July, 2024.


Notary Public

CHRISTOPHER SCHIANO
Notary Public, State of New York
No. 02SC4977203
Qualified in Monroe County
Commission Expires January 28, 2027

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